

Appendix B
BEST EMS Manual
(Draft)

EXAMPLE EMS MANUAL

Introduction

This section of the Toolkit provides an example of an EMS Manual; the EMS Manual that Beacon Stone National Monument (BEST) assembled to document their EMS. Its contents match the eight NPS EMS Elements. Tips on how the Manual was put together are contained in the Elements section of the Toolkit. As with any suggestions found in the Toolkit, these should be viewed at a minimum as a starting point – you will probably want to adapt and change the contents to reflect what is important at your park and how you manage your environmental affairs within the standardized framework of the NPS EMS.

Your EMS Manual should be the one place where you reference your entire park EMS. It can simply be a binder or folder that you use to keep a summary of all your documented procedures, records, decisions, tables, and other information that, when combined, fully describes how you manage your environmental activities within your park; or, it can point a reader to where those documents are kept.

The key to an EMS Manual is that it is current. The Manual must contain the latest most relevant information in order for it to be useful and to perform its intended function; that of the most up-to-date description of your environmental management activities.

An EMS Manual can serve many purposes. Its primary purpose is to provide park managers and staff with a consolidated working document for use in planning, understanding, and conducting environmental management activities. The Manual can be used to orientate new park employees regarding how you account for and conduct environmental management activities in the park. It can also be a good reference source to provide to third parties that would like to learn about your programs such as regional managers, concessioners and partners, internal auditors, and even regulators.

In order for the Manual to be useful (and therefore referred to) it should be kept simple. Try to avoid minute details – the Manual should point or refer to specifics, it is not necessary to include them all. Avoid duplication of procedures described elsewhere – make note of them, and provide sufficient information for a reader to find them for themselves. The “keep it simple” approach should be applied to all EMS activities; overburdening people through excess procedure is not what EMS is all about. It’s about working smarter, not harder.

Suggested Chapters

The following is a sample chapter list for your EMS Manual with a description of content. The list is a minimum of what you should consider for your EMS Manual.

- EMS title page
- Manual revision history and distribution list
- Table of contents
- Introduction to the Manual.
 - This brief section could include the following: purpose of the Manual; responsible party and contact information of the person/persons compiling the Manual; and, a brief history of the park and other documents such as the park's mission statement. These documents relay the importance of sound environmental management at a park and allow you to put the EMS in context as a management approach to upholding the intent describes within such documents.
- The Environmental Commitment Statement (ECS).
 - A copy of the current signed and dated environmental commitment statement (other copies should be posted throughout the park as part of your communication strategy) should be included in this section. Any documents, policies, or other regulations that are mentioned in the ECS could be referenced in this section to allow others to read up on the specifics of the ECS (e.g., NPS Director's Orders, DOI policy, Executive Orders).
- Facility activities and environmental impacts
 - The section should include a list of all of the environmental activities and impacts you discussed during your Environmental Management Team (EMT) meetings. In addition, you should list all of the regulatory requirements you are subject to at your park. These two lists form the basis of choosing your goals, objectives, and targets (and as a result, the direction of the EMS for a specific year). The list will be updated as impacts to your park come and go to better reflect the reality of operating in the current park environment. Once specific goals and targets have been realized, you will want to return to the most current version of this list to choose new goals, objectives, and targets as part of the continual improvement nature of EMS.
- Significant impacts and an explanation of why they were chosen
 - This section should detail what impacts were chosen from the longer list described above and should describe the process that was used to make these choices; such as what criteria were used to assess the impacts. Procedures are vital to an EMS – they ensure consistency and enable others to see how decisions were reached.

- Goals, objectives, and targets
 - A table including your goals, objectives, and targets should be included in this section of your EMS Manual. Also, background material and other references justifying the specifics of the targets should be included (or a reference to their whereabouts made).
 - Relevant environmental management plans (EMP) described by the park to achieve a specific target should also be included in this section of the Manual. The EMP is a temporary list of roles and responsibilities created solely for the purposes of achieving the identified target – not to be confused with the overall EMS roles and responsibilities referenced below.
- Roles, responsibilities, and accountability
 - EMS roles ensure that all the major functions of an EMS are carried out. They should be listed under in this section of your Manual. Roles can extend beyond traditional environmental activities to include budgets, personnel and other organizational issues.
- Document control, recordkeeping, and reporting
 - Include a list of EMS documents and responsibility for keeping them current.
 - Reference those environmental records that must be kept and those that are to be submitted to others as evidence of environmental management.
 - You do not necessarily need to include the hard copies of documents in this section; you can include a reference to where they are typically maintained or filed. Remember to reference the location of electronic documents on the Internet if you use them in management activities.
- Communication
 - This section should provide a summary of who you talk to, e-mail, phone, fax, or in some other way contact regarding EMS at your park, why you do it, when, and what message was transmitted, given, or imparted. Your communication strategy keeps people in the loop, inside and outside of the park boundaries, regarding your activities and successes in environmental management.
- Training
 - This section contains a matrix, table, or some other listing of how you keep up to date on who needs what environmental training and when. This section should also contain individual training records or provide a description of how and where they are kept (such as within personnel records).
- Monitoring, measurement, corrective action, and management
 - This section should provide a description of how well your park did on achieving your targets and undertaking specified activities to monitor and measure progress. Each target will have different attributes that will need to be assessed throughout the length of the EMP. Procedures, results, and suggestions for doing things differently if things did not go to plan should also be included here (a corrective action).

- How well did your park do with regard to the overall management of environmental activities? An assessment of the Elements of the EMS should be included here – maybe only in summary form with reference made to more detailed analysis kept elsewhere.
- This section should also provide a description of how the reviews occur and reference to reviews that have already been completed.
- A copy of the most recent management review and reference to older archived reviews. In addition, descriptions of the actions taken in response to the reviews should also be kept in this section.

Organizing Manual Chapters

This section of the document provides some suggestions on how you might organize the chapters of your EMS Manual; specifically how each chapter is internally organized. The BEST EMS Manual follows the same organization structure.

Each chapter should have the following structure:

- Preface each chapter with a purpose and scope statement. These two statements should be no more than a couple of sentences long. These statements quickly allows the reader to understand what the chapter is intended to describe and what it includes (and doesn't).
- Describe procedures managed by the chapter. It is often useful to organize the procedure using a numerical system. This may seem like overkill but it does have advantages; it allows for rapid review of sub-procedures and ease in making updates.
- Include a list of responsibilities that refer directly to the chapter in which they appear. (They are not the same as the overall EMS roles, responsibilities and accountabilities of your complete park-level NPS EMS.) The same type of numbering system used in procedures could be applied to organize responsibilities.
- Provide an appendix – a place to include forms, tables, or other information that support and document the actions described in procedures and responsibilities.
- Follow with other related documentation to provide a means to organize supporting material. Using such a section could keep the body of the EMS Manual readable and free of distracting and bulky references.
- Include a section on records that lists (and makes reference to) any records generated by following the procedures included in this chapter.

Putting it Together - the BEST EMS Manual

The following pages provide a sample layout for an EMS Manual – the BEST EMS Manual. The sample provided describes a fairly mature and complete EMS. Parks will not have all the pieces of their EMS documented from the outset. The EMS Manual should be a dynamic living document that is added to and modified as the park EMS continues to evolve.

The layout follows the organization described above. It is recommended that parks utilize this format to the extent practical. However, the EMS Manual organization should also meet the unique needs of the park.

BEACON STONE NATIONAL MONUMENT

Environmental Management System Manual



Version 1.0
April 2003

BEST EMS Manual revision history and distribution list

1. The current version was prepared in March 2003 and represents the first draft of the Manual.
2. The EMS Manual (Manual) will be reviewed quarterly by the EMT.
3. The Manual is distributed to the members of the EMT (see appendix, Chapter D,) and to the Superintendent and Deputy Superintendent.
4. Previous hard copy versions of the EMS Manual are returned to the EMT and recycled. Previous electronic copies of the EMS Manual are deleted. The EMT will archive one hard copy and one electronic copy of each version of the EMS Manual.

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Introduction to the BEST EMS Manual

1. This Manual describes the EMS in place at Beacon Stone National Monument (BEST).
2. The BEST EMS includes all eight Elements of the Model NPS EMS and conforms to the minimum requirements contained therein.
3. The Manual documents our overall EMS activities and our current EMS targets. Chapter B and C describe the process we follow to choose our current year's targets.
4. Each chapter contains the following sections: purpose; scope; procedure; responsibilities; appendix; related documentation; and records.

Chapter A Environmental Commitment Statement (ECS)

Purpose

The purpose of this chapter is to describe the scope of our Environmental Commitment Statement (ECS), the procedure used to develop and distribute it, and responsible parties. Included is the latest edition of our ECS.

Scope

The ECS governs our EMS activities at BEST.

1.0 Procedure

1. Our ECS is prepared by the BEST Environmental Management Team (EMT). The ECS is signed by the park Superintendent and has the full commitment of BEST management. (Chapter D of this EMS Manual contains a list of EMT members and their contact information).
2. The ECS is communicated to all personnel at BEST. The communication process is described in Chapter F of this Manual.
3. We follow the guidelines of Element A of the Model NPS EMS in preparing our ECS. We are guided by those requirements as we consider how our EMS can enhance environmental management activities at our park.
4. In addition to the procedures described in Chapter F we post a copy of our park's environmental commitment statement at key locations throughout the park (including all visitor centers and the park headquarters building). A copy of the ECS is provided in the appendix to this chapter.

2.0 Responsibilities

1. The EMT reviews the ECS annually (during the January EMT meeting) to ensure that it is current and fully expresses our environmental management priorities at BEST.
2. The Superintendent reviews any new version of the ECS.
3. The Superintendent signs the current final version of the ECS to demonstrate his or her management commitment and provides a signed copy to the EMT.
4. The EMT posts the ECS on the park web site and on employee bulletin boards.

3.0 Appendix

1. This appendix contains the current version of the BEST ECS.

BEST EMS Doc Control System	Document Name:	EMS Commitment Statement
	Document Number:	BEST-EMS-2003-001-01
	Date of Original Document:	1/09/03
	Date of this Revision:	NA
	Responsible Party:	Superintendent

**Environmental Commitment Statement
Beacon Stone National Monument, New State**

We at Beacon Stone National Monument (BEST) are committed to the NPS mission as stated in the Organic Act of 1916, which states that “the Service thus established shall promote and regulate the use of Federal areas known as national parks, monuments and reservations . . . by such means and measures as conform to the fundamental purpose of the said parks, monuments and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.”

In order to carry out its mission and ensure the preservation, conservation, and enhancement of the valuable natural, historic, and ecological resource with which we are entrusted, BEST will provide environmental leadership by example. We will conduct our operations in an environmentally responsible manner, in accordance with NPS Director’s Order #13 and other pertinent directives and Executive Orders relating to the environment. We will meet or exceed all applicable federal, state, and local environmental laws and regulations. To fulfill these commitments, we will incorporate best management practices, foster the sustainable use of natural resources, promote pollution prevention, reduce waste generation, purchase environmentally preferable products, and recycle and reuse all materials where practicable in our operations. We will promote this same level of practice with our concessioners and our cooperating partners.

We will continue to work cooperatively with federal, state, county, and local governments as well as other organizations and local communities to promote sound environmental management of the park and, to the extent of our authority and influence, of the surrounding region. We will strive to educate visitors, recreational users, and other park stakeholders on these concepts.

We will strive for continual improvement in environmental management.

We at BEST will provide leadership in working with park concessioners, suppliers, vendors, contractors, visitors, and patrons to comply with these same principles.

Signed

I. M. Sure
Superintendent
Beacon Stone National Monument

Date

4.0 Related documentation

1. See Management Policies 2001, National Park Service.

5.0 Records

NA

Chapter B Facility Activities and Environmental Impacts

Purpose

This chapter contains the procedures we follow to assess our facility activities and environmental impacts. Additional procedures included in this chapter describe how we rank those activities and impacts to determine which are significant to the environment at BEST.

An understanding of these facility activities and environmental impacts is important in determining the focus of our EMS, and where positive change in environmental management can be expected.

Scope

All activities that occur at BEST (including those of third parties, contractors, and concessioners) are subject to assessment.

1.0 Procedure

1. The EMT annually reviews park facilities and operations including, but not limited to: our current activities and impacts; environmental compliance requirements stemming from all applicable laws, regulations, and policies including open audit findings; NPS WASO and regional goals; and other objectives and direction, including those established by DOI or OFEE. Activities are also reviewed in light of our park's mission, our ECS, recent performance results, and input from our park partners.
2. The park EMT completes an interactions and impacts analysis. In assessing these interactions, a scoring system is used to determine the most significant impacts to our park and therefore potentially areas of focus in our EMS. The latest version of the scoring system is included in section 5.0 of this chapter.
3. Interactions, impacts, and legal and other requirements are reviewed on an annual basis, in conjunction with our senior management review, to determine if there are any changes that should be reflected in our EMS.
4. The EMT proposes to start out in the first year of our EMS (2003) by focusing on addressing regulatory and non-regulatory findings highlighted by the audit report. We will use the experience gained by accomplishing such goals to strengthen our EMS in subsequent years to include other, perhaps more complex, facility activities and environmental impacts.

2.0 Responsibilities

1. It is the responsibility of the EMT to conduct the facility activities and environmental impacts assessment.

2. The EMT summarizes the assessment and brief park management on its content and proposed goals, objectives and targets.
3. The results of the assessment are included in the appendix to this chapter of the Manual.
4. The EMT briefs park management upon achievement of specific EMS targets (see chapter H).

3.0 Appendix

This appendix contains the following:

1. CY03 facility activity and impact assessment summary.
2. An extract from our significant impact ranking used to evaluate facility activities and their impacts showing chosen targets.
3. A listing of our legal and other requirements and where these resources may be found (hard copy and electronic versions).

BEST EMS Doc Control System	Document Name:	Interactions Assessment
	Document Number:	BEST-EMS-2002-019-01
	Date of Original Document:	12/19/02
	Date of this Revision:	NA
	Responsible Party:	EMT Leader

Facility Interaction Assessment

Facility Activity	Interaction	Impact
Energy Use	Staff (and visitors) use energy for lighting, heating, air conditioning, pumping water, transport, and maintenance activities among other things.	Use of fossil fuels to generate power is a one-time consumptive use; generation of emissions at power stations has a local, regional and global impact upon the air, land and water; provision of the infrastructure to distribute power and processed fossil fuel has a visual impact upon landscape, land values, and alternative use impact (e.g., right-of-ways).
Hazardous Material Storage, Handling and Use	Staff store, handle and use HM in a variety of tasks, i.e., maintenance activities such as cleaning, degreasing, painting, and corrosion prevention.	Impact upon staff health through absorption, ingestions, inhalation or injection of hazardous materials if improperly stored, handled or used; possible fire hazards from incorrect storage of corrosives with flammable substances; environmental releases (liquid spills, vapors) can occur from products not stored or handled properly; disposal of spent/used materials contaminated through incorrect separation is costly, time-consuming, and waste products can end up in landfills.

BEST EMS Doc Control System	Document Name:	Significant Impact Ranking
	Document Number:	BEST-EMS-2002-020-01
	Date of Original Document:	12/31/02
	Date of this Revision:	NA
	Responsible Party:	EMT Leader

Significant Impact Ranking

Facility Activity	Severity	Frequency	Financial	Stakeholder	Total
Energy Use (audit to explore possibilities regarding energy conservation)	2	3	3	2	10
HM storage, handling and use	2	3	2	2	9

BEST EMS Doc Control System	Document Name:	Legal & Other Reqs.
	Document Number:	BEST-EMS-2002-004-01
	Date of Original Document:	08/14/02
	Date of this Revision:	NA
	Responsible Party:	EMT Leader

Legal and Other Requirements

Program Area/Requirement
<i>Environmental Laws, Regulations and Policies (including requirements to appropriately store handle and use HM).</i>
Federal Laws and Regulations
State Laws and Regulations
Environmental Plans
Green Procurement
Emergency Action Plan (list version and date)
Spill Prevention Control and Countermeasure Plan/Emergency Response Plan (list version and date)
Hazard Communication
Environmental Permits
New State UST Permit #1723A
RCRA Generator #555
Boiler Emission Permit #GR-07-6323-90
<i>Energy Conservation (Executive Order 13123)</i>
Town of Localburg Wastewater Discharge License – December 1999

BEST EMS Doc Control System	Document Name:	Reg. Environmental Info.
	Document Number:	BEST-EMS-2002-005-01
	Date of Original Document:	09/01/02
	Date of this Revision:	NA
	Responsible Party:	EMT Leader

Regulatory Environmental Information Resources

Source	Data	Address/Park Location	Access
Internet	Federal environmental laws and regulations, guidance	www.epa.gov	BEST-wide
Internet	New State environmental laws and regulations, guidance	www.state.us	BEST-wide
Paper copy	Localburg environmental laws and regulations, guidance	Environmental Coordinator's office	Upon request

BEST EMS Doc Control System	Document Name:	Supp. Environmental Info.
	Document Number:	BEST-EMS-2002-005-01
	Date of Original Document:	09/01/02
	Date of this Revision:	NA
	Responsible Party:	EMT Leader

Supplemental Environmental Information Resources

Source	Data	Address/Park Location	Access
Internet	DOI environmental policies	www.doi.gov/nrl/	BEST-wide
Internet	DOI environmental guidance - Office of Environmental Policy and Compliance (environmental compliance, NEPA, NRDA)	www.doi.gov/oepc	BEST-wide
Internet	Greening the Government Executive Order 13123	www.eere.energy.gov/femp/resources/exec13123.html	BEST-wide
Internet	OSHA regulations	www.osha.gov/SLTC/hazardcommunications/index.html	BEST-wide
Internet	DOI environmental guidance – Property Acquisition and Management (Environmentally preferable purchasing)	www.doi.gov/pam	BEST-wide
Internet	General environmental information	www.cleanstuff.com	BEST-wide
Service Intranet	Enter key Service intranet sites	www.nps.gov	BEST-wide
Paper Copies/CD	EMS training and resource materials	EMT Files	Upon request
Paper Copies/CD	Pollution Engineering Magazine & similar reference materials	Environmental Coordinator's office	Upon request
Telephone/in person	Greening and natural resource management reference materials, case studies	Natural Resource Manager's Office	Upon request

4.0 Related documentation

The environmental audit report recently conducted at BEST provides additional data related to the BEST EMS. Specifically, it identifies opportunity for environmental improvement at BEST that the NPS Audit Program has identified based on a broad set of environmental criteria. These “findings” are required to be completed. As such they have been identified as the basis of our EMS targets for CY03:

1. Audit finding # 040, based on requirements summarized on the Energy and Water Conservation Environmental Check Sheet. The findings describes that “The Park had not conducted a formal energy audit to assess its status with respect to energy usage and opportunities for improvement. There were no procedures to formally consider energy efficiency, renewable energy, or sustainable design concepts in building design.” This finding was based on a failure to meet a requirement within Executive Order 13123.

It should be noted Section 9.1.7 of the Management Policies 2001 states that “The Service will also comply with applicable Executive Orders, including Executive Order (EO) 13123 (Greening the Government Through Effective Energy Management).” In addition, the Management Policies also state that “All facilities will be operated and managed so as to minimize the consumption of energy, water, and non-renewable fuels. Full consideration will be given to the use of alternative fuels.”

2. Audit finding # 023. “Incompatible material was stored in same location.” This finding was based on the regulatory requirements found at 29 CFR 1910.176 (c).

5.0 Records

The following components make up our interactions and impacts analysis ranking system. Each facility activity is assessed and based upon a summation of the following criteria, is deemed significant or not. We currently set a minimum score of 9 to delimit whether or not an impact is significant.

1. We Assign a ranking score to each one based on the following four criteria:
 - a. *Severity* – What is the severity of the impact?
 - 1- Minimal severity or aesthetic impact only
 - 2- Moderate impact to water, air or land quality
 - 3- Substantial impact to water, air or land quality or detrimental to human health, or flora and fauna
 - b. *Frequency* – What is the overall frequency or probability of the impacts occurring?
 - 1- Low frequency/less than once a year
 - 2- Moderate frequency/more than once a year and less than once a month
 - 3- High frequency/monthly or more frequent

- c. *Financial* – What is the overall economic effect of correcting the impact?
 - 1- Correcting the impact is likely to be prohibitively expensive
 - 2- Associated costs are negligible or modest
 - 3- Correcting the impact is likely to save the park money with a payback
 - d. *Stakeholders* – How would stakeholders react to, or be affected by, the impact?
 - 1- Neutral or disinterested
 - 2- Mildly concerned
 - 3- Greatly concerned
2. Once ranking scores have been assigned, we add up the rows. Impacts with the scores greater than 9 can be considered significant impacts worthy of addressing through our EMS.

Chapter C Goals, Objectives, and Targets

Purpose

To describe the process used by the BEST EMS to choose appropriate goals, objectives and targets for our EMS.

Scope

This chapter contains a description of how we choose our goals, objectives and targets for the significant impacts previously identified in chapter B.

Goals, objectives, and targets are identified and reviewed during this process to maintain and improve park operations, preserve, conserve, and protect park resources, and demonstrate environmental leadership.

These goals, objectives, and targets are practical, realistic, and provide clear direction for park environmental management activities. Chosen goals, objectives and targets will normally be achieved within the calendar year.

1.0 Procedure

1. The EMT uses the significant ranking table in Chapter B, Facility Activities and Environmental Impacts, to identify those significant impacts to be addressed through the imposition of goals, objectives and targets.
2. In addition to 1.0 above, the EMT uses the list of open environmental audit findings as part of the process to determine appropriate goals, objectives, and targets. We refer to the policy or regulation that relates to the audit finding and the audit finding recommended corrective action to provide specific guidance in determining what is needed to achieve a goal, objective or target if that finding is selected.
3. The goals, objectives and targets are listed in separate tables and included in the appendix to this chapter. Any information used to substantiate the choice of goals, targets and objectives will be incorporated, or referenced, in section 4.0 of this chapter.
4. The EMT develops an Environmental Management Plan (EMP) for each identified goal, objective and target. The EMP describes how to achieve the specific goal, objective and target. It details who is responsible for each of the goals, objectives, and targets identified, and what resources are available for their achievement. It outlines dates by which these goals, objectives and targets are to be accomplished.

2.0 Responsibilities

1. The EMT selects the EMS goals, objectives, and targets for the year.

2. The EMT drafts an EMP for each identified goal, objective, and target.

3.0 Appendix

The appendix contains the following:

1. A table for each identified goal, objective and target.
2. A summary EMP describing how each goal, objective and target is to be achieved.

BEST EMS Doc Control System	Document Name:	EMS G, O&T 03
	Document Number:	BEST-EMS-2003-001-01
	Date of Original Document:	02/06/03
	Date of this Revision:	NA
	Responsible Party:	EMT Leader

Goals, Objectives and Targets

#	Goal	Objective	Target	Summary of Activity
1	Conserve Energy at BEST	Reduce energy consumption per gross square foot within BEST facilities by 30 percent by 2005 and 35 percent by 2010 relative to 1985 (as called for under EO 13123).	<ul style="list-style-type: none"> Undertake complete Energy Audit of BEST facilities by end of CY03. 	<ul style="list-style-type: none"> All facilities (admin offices, visitor centers, maintenance facilities and others deemed appropriate) within BEST to be audited by end of June 2003. Cooperate with concessioners and extend offer to include concession-run facilities within the energy audit. Cooperate with LocalPower Inc. (local utility company) – request audit and inspection. Coordinate with Regional Energy Coordinator. Draft Energy Audit by end Aug 2003. Final Energy Audit by end of CY03 – audit to contain suggested projects to be undertaken in CY04 to achieve energy conservation measures as outlined in EO 13123.
2	Better manage hazardous materials (HM).	Reduce potential for incorrect storage, handling and use of HM within the park.	<ul style="list-style-type: none"> Correct all audit findings related to HM within the park. 	<ul style="list-style-type: none"> Inventory all HM in all facility operations (HM present on site). Identify responsibilities regarding storage, handling, and use. Ensure MSDS are accessible to appropriate staff. Ensure appropriate labels are posted on HM. Develop improved Hazard Communication Training Program. Train staff on identified hazards of storing, handling, and using HM.

BEST EMS Doc Control System	Document Name:	EMS EMP
	Document Number:	BEST-EMS-2003-002-01
	Date of Original Document:	02/10/03
	Date of this Revision:	NA
	Responsible Party:	EMT Leader

Summary Environmental Management Plan

ECS, Goal, Objective or Target #	Responsible Party	Existing or New Program Area	Budget	Estimated Level of Effort (per week)	Completion Date and Report Due
1 Energy Audit*	<p>Primary - Marty Higgins, BEST Collateral Duty Energy Coordinator</p> <p>Review annual energy report.</p> <p>Review energy audit (if available).</p> <p>Contact concession specialist and offer to include concession operations in audit.</p> <p>Energy walkthrough and interview staff on energy saving practices.</p> <p>Also involved – Regional Energy Coordinator (source of information, possible sample questions and walkthrough templates and guidance).</p>	New – Energy Efficiency	\$1500	5 hours (Marty Higgins)	<p>Review of annual energy report and energy audit due by end of 3/03.</p> <p>Contact concessioner management and coordinate with NPS concession staff regarding cooperative approach.</p> <p>Completion of walkthrough by 5/03.</p> <p>Summary report by end of 6/03.</p> <p>Completion of staff interviews by end of 7/03. Draft summary report by end 8/03.</p> <p>Recommendations for energy efficiencies and new projects by mid 9/03.</p>

ECS, Goal, Objective or Target #	Responsible Party	Existing or New Program Area	Budget	Estimated Level of Effort (per week)	Completion Date and Report Due
2 Appropriate storage, handling and use of HM (correction of Audit findings)**	Purchasing assistant - order labels and storage cabinets.	Existing – Compliance	\$2500	1 hour	Order & distribute labels by 4/30/03
	Chief of Maintenance – establish hazardous material storage areas.			1 hour	Establish area with input from staff by 5/03.
	Safety Officer – develop improved HAZCOM training module and SOP for handling, storing, and labeling hazardous materials and deliver HAZCOM training and SOP training.			8 hours	Completion of SOP and train staff by end of 6/03.
	Park staff - attend briefing on SOP.			0.5 hours each	Complete 6/03 Prior to staff training.
	Concessions specialist – coordinate participation with concessioner				
	Maintenance staff - segregates materials and label containers per SOP.			4 hours	Complete by end of 5/03
	Park Superintendent - update audit finding correction on NPS website.			2 hours	Update by end of 6/03.

* and ** see Explanatory Notes (see section 4.0)

4.0 Related documentation

The following table contains information taken from EO 13123

Sec. 201. Greenhouse Gases Reduction Goal. Through life-cycle cost-effective energy measures, each agency shall reduce its greenhouse gas emissions attributed to facility energy use by 30 percent by 2010 compared to such emissions levels in 1990.
Sec. 202. Energy Efficiency Improvement Goals. Through life-cycle cost-effective measures, each agency shall reduce energy consumption per gross square foot of its facilities, excluding facilities covered in section 203 of this order, by 30 percent by 2005 and 35 percent by 2010 relative to 1985.
Sec. 204. Renewable Energy. Each agency shall strive to expand the use of renewable energy within its facilities and in its activities by implementing renewable energy projects and by purchasing electricity from renewable energy sources.
Sec. 205. Petroleum. Through life-cycle cost-effective measures, each agency shall reduce the use of petroleum within its facilities. Agencies may accomplish this reduction by switching to a less greenhouse gas-intensive, non-petroleum energy source, such as natural gas or renewable energy sources; by eliminating unnecessary fuel use; or by other appropriate methods. Where alternative fuels are not practical or life-cycle cost-effective, agencies shall strive to improve the efficiency of their facilities.
Sec. 207. Water Conservation. Through life-cycle cost-effective measures, agencies shall reduce water consumption and associated energy use in their facilities to reach the goals set under section 503(f) of this order. Where possible, water cost savings and associated energy cost savings shall be included in Energy-Savings Performance Contracts and other financing mechanisms.

Energy Audit

1. The EMT understands that BEST is not in itself an Agency; as a park within the NPS, however, we recognize that efforts we make at the park level will be combined at the Service level and ultimately at the DOI-level. All of the efforts we make will contribute to the achievement of the energy goals as stated in the EO.
2. Our target for the year relates to a study of the current energy practices that take place at our park. We need to gather information before any “concrete” action can be taken towards the specific targets of Section 202 above (i.e., we need to identify specific projects in the energy audit before we decide how they will be funded and implemented in following years).
3. We will review any available energy audits and follow up on the status of any past recommendations.
4. If these documents are available, we will conduct an energy “walkthrough.” The walkthrough will include observation of the following: lights (left on in empty rooms, whether all bulbs/tubes are required to sufficiently light a space, exit signs use LED not incandescent and fluorescents, motion detectors are in use) HVAC (furnaces, air conditioners), insulation, doors/windows, all appliances, flow rating on toilets, water saving devices on faucets, seals/caulk/weather-stripping, window treatments, and, landscape site details (such as provision of shade, orientation of windows).

5. We will meet with relevant maintenance and office personnel as a means to informally gather data.
6. In addition to the above informal interviews with staff, we will conduct informal random interviews with staff regarding their own personnel experience with energy saving practices. Questions such as whether the individual has ever received training on energy saving practices will be asked. Also we will ask what the individual's currently do with regard to energy saving e.g., turning off lights after leaving a room/building, specific use of office equipment (computers, faxes, printers, monitors), other peripheral office equipment (coffee machines, radios, fans, refrigerators, and other appliances), and whether personnel use "Energy Star" appliances.
7. We will contact the NPS concessions specialist to coordinate with concessioner management regarding having concession facilities included in the energy audit. We realize that all buildings within the park, whether operated by BEST or BEST's concessioners have an impact on consumptive energy use.
8. We will strive to achieve the interim and final milestones for this target as outlined in the summary table above. The final energy audit report, with recommendations, will be use to identify specific targets (projects) for next year's EMS.

Hazardous Materials Management

1. With regard to the HM target we recognize that BEST has a schedule to correct all audit findings by the end of 2003. We will develop guidelines and procedures to educate park staff on the appropriate methods for storing, handling and using hazardous materials by December 2004. We will strive to reduce the amount of hazardous materials used at the park by 20% by December 2005.
2. The development of the HM storage, use and handing SOP is for primary use in the maintenance area. It will include all of the HM currently used in such areas.
3. The BEST EMT recognizes that several concessioner operations with the park also use the same kinds of HM. The EMT proposes that the SOP and the training associated with its implementation be shared with our concessioners. By encouraging the appropriate storage, handling and use of HM park-wide we will leverage resources and provide for comprehensive protection of the BEST environment.

5.0 Records

NA

Chapter D Roles, Responsibilities and Accountability

Purpose

To assign roles, responsibilities, and accountability to personnel charged with both specific EMS and general environmental management activities within BEST.

Scope

Sound environmental practices, like sound safety practices, are considered everyone's job at BEST. This responsibility is incorporated into all position descriptions as a general performance element on environmental management.

1.0 Procedure

1. The EMT compiles a detailed listing of all personnel on the EMT.
2. The EMT lists all personnel involved with the BEST EMS.
3. The EMT completes all associated Manual tables identified in the appendix to this chapter.
4. The roles and responsibilities identified in this chapter conform to the established personnel system based on relevant documentation.
5. The EMT reviews position descriptions and job responsibilities for all personnel. Critical environmental responsibilities are identified and incorporated into position descriptions and annual performance plans for key employees.
6. The EMT identifies key roles and responsibilities for appropriate third parties (concessioners, contractors) operating in the park. These roles and responsibilities are incorporated into appropriate contract documents.
7. Employees are informed of their designated environmental responsibilities when they start their job. They are made aware of these responsibilities and associated environmental practices at the time of assignment through an initial park orientation training and specific job orientation provided by their supervisor.
8. Duties are assessed by supervisors in the course of day-to-day activities. Supervisors are responsible for correcting staff on an ad hoc basis when improper procedures are observed.
9. Supervisors are responsible for conducting formal annual performance evaluations for staff under their administration. This performance evaluation considers performance related to the general performance element and job specific performance requirements in

personnel position descriptions, as well as personnel success in meeting EMS goals. Performance is to be measured using Service criteria and procedures.

10. Failure to complete designated environmental responsibilities in a satisfactory manner may be grounds for disciplinary action and termination dependant upon the severity and persistence of the behavior in accordance with Service policies and procedures.

2.0 Responsibilities

The EMT updates the tables detailing EMT and other EMS personnel.

3.0 Appendix

The appendix contains the following:

1. A table listing the members of the BEST EMT.
2. A table detailing the roles and responsibilities associated with the targets identified in Chapter C.

BEST EMS Doc Control System	Document Name:	EMS EMT Team
	Document Number:	BEST-EMS-2002-008-01
	Date of Original Document:	10/09/02
	Date of this Revision:	NA
	Responsible Party:	EMT Leader

BEST Environmental Management Team

Position	Name	Contact Information
Park Superintendent	I. M. Sure	(878) 222-2000 – operator (878) 222-2222 - direct Radio Call #: IM_Sure@nps.gov
Park EMT Leader	Mary O'Connor	
EMS Management Representative		
EMS Secretary		
EMT Communication Specialist		
EMT Team Member		
EMT Concessions Specialist		
EMT Team Member		
BEST Energy Coordinator – target #1 project leader	Marty Higgins	(878) 222-2000 – operator (878) 222-2222 - direct Radio Call #: marty_higgins@nps.gov
Chief of Maintenance - target #2 leader	Mike Hutchinson	(878) 222-2000 – operator (878) 222-2222 - direct Radio Call #: Mike_hutchinson@nps.gov

BEST EMS Doc Control System	Document Name:	EMS Roles & Resp.
	Document Number:	BEST-EMS-2003-003-01
	Date of Original Document:	02/07/03
	Date of this Revision:	NA
	Responsible Party:	EMT Leader

EMS Roles and Responsibilities
(Specific to the completion of the energy audit and
HM storage, handling and use targets)

Position	Responsibility
Energy Audit	
Superintendent	Support Energy Conservation Initiative.
Deputy Superintendent	Support Energy Conservation Initiative.
EMT Leader	Draft e-mail memo for park-wide circulation announcing the energy target; work with project leader on scheduling energy audit visits to BEST facilities; brief the Deputy Superintendent (when requested) regarding progress; brief the EMT on a periodic basis regarding the progress being made under this target.
BEST Energy Coordinator – project leader	Conduct energy audit of BEST facilities; draft energy audit report as laid out in EMS EMP – Energy #1 CY03; draft final energy audit report as laid out in EMS EMP – Energy #1 CY03.
Concessions Specialist	Coordinate with BEST concessioners; work with concessioner management to include concession facilities within the energy audit.
Park Staff (Admin, Facility Maintenance, etc)	Cooperate with the energy audit scheduled for their facilities; provide suggestions to project leader on what might be appropriate to implement to achieve energy savings within BEST.
NPS Regional Energy Coordinator	Provide expertise regarding energy audit protocols within the NPS; accompany project leader on an audit/inspection of the current energy-using activities with BEST facilities; provide information on the best available energy efficient technologies that might be utilized with BEST.
Note: Individuals listed in the row below are non-NPS employees. Their cooperation has been sought, but cannot be guaranteed. They are not critical to the success of the Target, but can provide useful information and be of assistance to BEST staff.	
LocalPower Inc. POC	Provide expertise regarding energy use within BEST facilities, including a trend analysis of the past 20 years of power usage at the park; assist project leader by providing a utility-energy audit of current BEST facilities.
HM Storage, Handling and Use	
Superintendent	Update the audit findings database. Support HM initiative with necessary funds.
Purchasing Assistant	Coordinate with the Chief of Maintenance to ascertain the type and quantity of labels, HM Storage Cabinets and other supplies necessary to appropriately store, handle and use HM in the park.
Chief of Maintenance	Establish hazardous material storage areas at appropriate locations where HM is used. .
Maintenance Forman	Develop SOP for handling, storage and labeling of hazardous materials and instruct staff on SOP.
Concessions Specialist	Coordinate with BEST concessioners; work with concessioner management to make them aware of the SOP development and the forthcoming HAZCOM and HM storage, handling, and use training.
Regional HM Coordinator	Respond to requests from chief of maintenance and maintenance foreman regarding HM storage, handling and use specifics.
Designated Staff	Attend HAZCOM training briefing on HM SOP; follow procedures in work areas to ensure HM is appropriately stored, handled and used.

4.0 Related documentation

NA

5.0 Records

NA

Chapter E Document Control, Recordkeeping and Reporting

Purpose

To describe the procedures to be followed to ensure a comprehensive document and record management system is implemented and maintained at BEST. This system will ensure all appropriate personnel have access to documents and records necessary to manage environmental activities at BEST.

Scope

This chapter describes how we manage our environmental document and records at BEST.

1.0 Procedure

1. EMS documents for BEST are maintained through a formal file management system. The central EMS documents file is maintained at the park headquarters. This file contains all key environmental documents and records generated by the BEST EMS. The EMT secretary is responsible for maintaining the file. In addition, key EMS documents are included in various appendices in this Manual.
2. Environmental records for BEST are maintained through a formal environmental records management system. This system conforms to Service and regional standards. The system is designed to ensure compliance with all reporting requirements mandated by law, regulation, and policy; maintain accountability for key operations; assure timely and efficient access to environmental data; and maintain security where necessary. The system consists of both hard copy and electronic files (where allowed by law). Included in this system is a central environmental reporting file maintained at park headquarters. This file contains all key environmental reports for the park. The EMT secretary is responsible for maintaining the reporting file.
3. Each document and record receives a label containing specific information that will help in its control and file management. See section 5.0 for a detailed graphic depicting the contents of that label.
4. Certain files such as logs and inspection and monitoring reports are generated, and/or required to be maintained, in operational areas. These reports are maintained at the point of use and are under the administrative control of the operational area supervisor. Some of these operational files may be designated as “important”. These files are duplicated and copies or originals are maintained in the central file.
5. Our EMS documents and environmental records tables, provided in the appendix, lists all of the key documents, records, and reports used, generated, and/or submitted by the park. These reference tables are not designed to include documents and records. The documents and records requirements listed in this table are reviewed and the table updated at least annually. A copy of the summary table is in the appendix to this chapter.

2.0 Responsibilities

1. The EMT is responsible for overseeing and making any required changes to the document control, recordkeeping and reporting procedure.
2. The EMT secretary is responsible for keeping the environmental document, records, and reporting control table current.

3.0 Appendix

The appendix contains the following:

1. A table listing the BEST EMS documentation.
2. A table listing the environmental records required at BEST.

BEST EMS Doc Control System	Document Name: Document Number: Date of Original Document: Date of this Revision: Responsible Party:	EMS Documentation BEST-EMS-2002-013-01 10/09/02 NA EMT Leader
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EMS Documentation

Document	Location	Document Number	Party Responsible for Update
EMT information	Posted in HQ building; on park intranet; Chapter D Appendix EMS Manual	BEST-EMS-2002-008-01	EMT
Facility Interaction Assessment	Chapter B Appendix BEST EMS Manual	BEST-EMS-2002-019-01	EMT
Significant Impact Ranking	Chapter B Appendix BEST EMS Manual	BEST-EMS-2002-020-01	EMT
Goals, Objectives and Targets	Posted in HQ building; on park intranet; Chapter C Appendix EMS Manual	BEST-EMS-2003-001-01	EMT
EMP(s)	Posted in HQ building; on park intranet; Chapter C Appendix EMS Manual	BEST-EMS-2003-002-01	EMT/energy project leader/chief of maintenance
Roles and Responsibilities	HQ Building Administration Office Room 208 Personnel Files; Chapter D Appendix EMS Manual	BEST-EMS-2003-003-01	EMT Leader
Communication Strategy	Posted in HQ building; on park intranet; Chapter F Appendix EMS Manual	BEST-EMS-2003-005-01	EMT
Internal Assessments	TBD; will be included in Chapter H Appendix EMS Manual	NA as of 2/28/03	
Management Reviews	TBD; will be included in Chapter H Appendix EMS Manual	NA as of 2/28/03	

BEST EMS Record Control System	Document Name:	Environmental Records
	Document Number:	BEST-EMS-2003-014-01
	Date of Original Document:	02/12/03
	Date of this Revision:	NA
	Responsible Party:	EMT Leader

Environmental Records

Document Title	Location	Version	Responsible Party
Park General Management Plan			
NEPA documents			
Cultural resource documents			
Applicable environmental regulations			
Service, region and park policies			
Program plans (e.g., Hazard Communication Plan)			
Standard operating procedures (SOPs)			
Inventories (e.g., hazardous substances, hazardous wastes, solid wastes)			
Notice of Violation (NOV)			
Environmental reports to regulatory agencies (e.g., biannual hazardous waste reports, discharge monitoring reports)			
Environmental reports (e.g., waste reduction, environmental budget, pesticide use proposals)			
Concession environmental documents and reports			
Environmental permits (e.g., NPDES, air)			
Park and concession environmental audit and corrective action reports			
Internal operational evaluations			

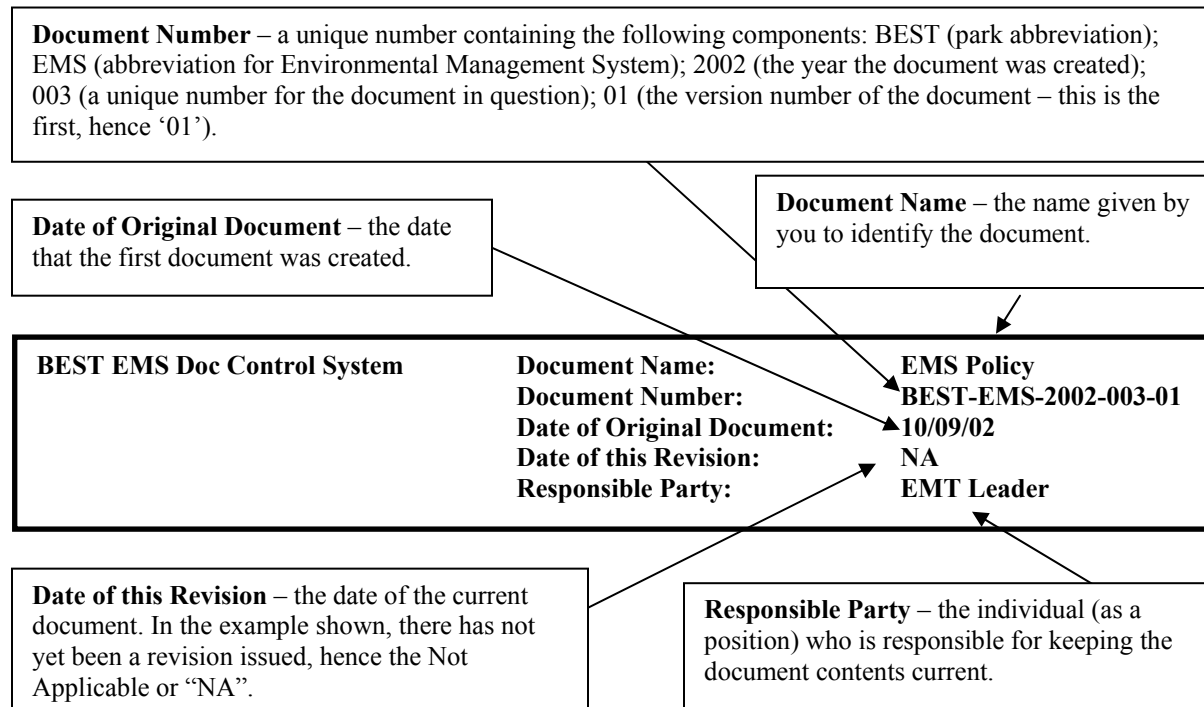
Document Title	Location	Version	Responsible Party
Environmental sampling data			
Operational logs, inspection and monitoring reports			
Miscellaneous environmental records			
Environmental budget data			
Training documents and reports			
Personnel data			

4.0 Related documentation

NA

5.0 Records

The following graphic depicts the elements of our document and record management label, attached either electronically or manually to each controlled document and record.



Chapter F Communication

Purpose

To ensure that all appropriate parties that require information to manage environmental activities at BEST receive that information in a timely manner and to publicize the successes of the BEST environmental management system and to involve all interested parties in environmental management at the park.

Scope

This chapter details the BEST approach to conduct communications internally (within park boundaries) and externally (outside park boundaries).

Information relating to the communication required to achieve the identified goals, objectives and targets is also included.

1.0 Procedure

1. The EMT uses general internal and external communication.
2. Internal communication ensure that all staff and appropriate partners operating in the park are kept up to date on environmental matters, and are provided with the necessary information to perform their duties. Internal communication methods provide a venue for personnel to provide input on environmental performance.
3. Methods of internal communication include; training classes, staff meetings (including a monthly safety and environmental meeting), fact sheets, formal and informal talks, internal emails and memos, bulletin board postings, and others.
4. External communication ensures the appropriate sharing of information with all parties interested in the operation of BEST.
5. External communication is maintained through formal National Park Service public announcements, the general Service website (www.nps.gov) and the park website, press releases, community meetings, public interfaces, external memorandums, and other casual information sharing. All public announcements conform to Service protocol and regional standards. External parties vary considerably; they can be park support groups or interested visitors requesting information on park greening practices and energy and water conservation.
6. The EMT designs and implements specific communication needs relating to the achievement of the identified goals, objectives, and targets.

2.0 Responsibilities

1. The EMT is responsible for maintaining the communication strategy.
2. Public Relations officer writes informational pieces on EMS progress and provide to proper channels for distribution.
3. Superintendent or designated individual reviews all external documentation prior to release.

3.0 Appendix

The appendix contains the following:

1. A table detailing both the general internal and external communication strategy and that associated with achieving the EMS goals, objectives and targets.

BEST EMS Doc Control System	Document Name:	EMS Communication
	Document Number:	BEST-EMS-2003-005-01
	Date of Original Document:	02/13/03
	Date of this Revision:	NA
	Responsible Party:	EMT Leader

Environmental Communication Strategy

Audience	Communication Type / Mechanism	Content	Responsibility
General Internal Communication			
BEST staff			
BEST Management			
General External Communication			
Friends of BEST			
Gateway Communities			
Goals, Objectives and Target - Energy Audit Target			
BEST staff	Draft E-mail	Describes the energy audit process, the expectations and goals, approximate duration of the project, and provides POCs for the project.	EMT (with input from energy project coordinator)
Park management	E-mail from management to park staff	See above.	Deputy Superintendent
Region energy coordinator	Ad hoc e-mail and telephone correspondence	Open communication on project; requests for information and other resources.	Energy project coordinator
Region management	E-mail from Deputy Superintendent	Progress on Energy Conservation target.	EMT (draft e-mail); DS (to send)
WASO	Reporting through WASO EMS website	General information and answers to web site questions regarding targets, goals.	EMT (with input from energy project coordinator)
Partners (LocalPower)	Letter; ad hoc e-mails	Request for energy records; request for energy audit assistance.	Energy project coordinator
Goals, Objectives and Target - HM Storage, Handling and Use			
BEST staff storing, handling and using HM	Draft e-mail	Describes the need for new and appropriate procedures to correctly store, handle and use HM.	Maintenance foreman
BEST concession management	Draft e-mail	Describes the upcoming development of an SOP on the appropriate procedures to correctly store, handle and use HM – invites concession staff whose duties involve the storage handling and use of HM to participate in the SOP training.	Concessions specialist
Region HM coordinator	Ad hoc e-mail and telephone correspondence	Open communication on project; requests for information and other resources.	Chief of Maintenance

4.0 Related documentation

NA

5.0 Records

NA

Chapter G Training

Purpose

To provide a system to manage the environmental training needs of personnel at BEST; to ensure the right environmental information is given to the right individual to enable him/her to carry out their duties to the best of their abilities.

Scope

This training chapter describes how we manage our environmental training program at BEST.

1.0 Procedure

1. The EMT ensures that the personnel at BEST are provided with the knowledge and skills to safely, competently, and legally fulfill their EMS and other environmental responsibilities.
2. Individual division/department management annually assesses all positions under their control at BEST to determine the associated training requirements for these positions. Management coordinates such a review with the personnel department and the EMT.
3. Management is invited to report to the EMT on a periodic basis (no less than annually, at a regular EMT meeting) with regard to the training requirements for personnel under their supervision and the status of training for those individuals.
4. Based on the assessment under 1.2. of this chapter, training is scheduled by management (and coordinated through the EMT) for specific individuals.
5. Different methods of training may be utilized at BEST including traditional classroom, field practicum, and distance learning. Training is offered through internal park programs, regional and Service programs, and commercial trainers.
6. All training conducted at BEST complies with training standards developed by the region and the Service.
7. Every effort is made to invite, or partner with, third parties within the park such as contractors and concessioners where appropriate to leverage training resources and to encourage collaboration and foster understanding by all parties with the park.

2.0 Responsibilities

1. Individual responsibilities for determining training requirements and maintaining training records are described in section 1.0 of this chapter.

2. Overall coordination of training at BEST lies with the EMT.

3.0 Appendix

The appendix contains the following:

1. The BEST environmental training matrix.
2. A copy of an individual training record (original filed with personnel).

BEST EMS Training Matrix	Document Name:	EMS Training Matrix
	Document Number:	BEST-EMS-2002-010-01
	Date of Original Document:	09/09/02
	Date of this Revision:	NA
	Responsible Party:	EMT Leader

Environmental Training Matrix

Training	Type	Trainer	Employees Covered	Frequency
EMP Awareness	In-house, classroom	Deputy Project Leader	All	Initial hire; annual refresher
SOPs (specify)	In-house, classroom, and field	Area Supervisor	Applicable Personnel	Initial hire; annual refresher
EAP	In-house, classroom, and field	Regional Coordinator	Applicable Personnel	Initial hire; annual refresher
SPCC/ERP	In-house, classroom, and field	Safety Officer	Designated Emergency Response Personnel	Annual
HAZWOPER	Off-site	NPS HAZWOPER Trainer	Designated Emergency Response Personnel	Annual
HAZCOM	In-house, classroom, and field	Safety Officer	Applicable Personnel	Initial hire; annual refresher
<i>Energy Conservation</i>	<i>Regional sponsored classroom training</i>	<i>Region Energy Coordinator</i>	<i>Marty Higgins</i>	<i>One time (06/05/02)</i>

BEST EMS Training Record	Document Name:	EMS Training Record
	Document Number:	BEST-EMS-2002-011-01
	Date of Original Document:	06/12/02
	Date of this Revision:	NA
	Responsible Party:	EMT Leader/Personnel

Environmental Training Record

Name: A.N.Other			
Training Type	Trainer	Date	Date Next Training Required
Solid Waste Management SOP	Facility Maintenance	11/13/02	Upon update to SOP
Energy Conservation (Based on issue of EO 12123)	Regional Coordinator	06/05/02	Not applicable
Integrated Pest Management SOP (Based on latest policy from Region/WASO)	Regional Coordinator	08/03/01	Upon notification from Regional Coordinator
SPCC	Facility Maintenance	02/09/01	Upon update of SPCC plan
Green Procurement (incorporates issues raised in EO 13101)	Regional Coordinator	06/07/00	Not applicable
Others (list):			

4.0 Related documentation

NA

5.0 Records

1. The summary environmental training matrix (contained in the appendix to this chapter) will be updated to reflect current park needs in accordance with sections 1.2 and 1.3 of this chapter. At a minimum the matrix will detail the type and frequency of training required by BEST staff in their various positions. It will also include who has been trained and who is responsible for administering the training.
2. In order to ensure that all the appropriate training has been received by the individual in a particular position, detailed records of who has received environmental training will be maintained by the division and/or the personnel department. These individual training records will be kept as part of the employee's personnel file.

Chapter H Monitoring, Measurement, Corrective Action, and Management Review

Purpose

To ensure we have the best opportunity to achieve our goals, objectives and targets and other environmental management responsibilities within BEST; to correct efforts where needed and provide guidance and assistance to those involved in achieving positive outcomes in environmental management in the park.

Scope

This chapter describes the various assessments we undertake to ensure the performance of our environmental management activities, and those of other parties operating within the park, meet the standards set in our ECS.

1.0 Procedure

1. The EMT conducts an annual Environmental Performance Review (EPR). The EPR will be led by the EMT team leader and will determine whether the park has achieved the environmental goals, objectives and targets described in chapter C of this Manual. The results of the EPR will be documented and a copy included in the appendix to this chapter and maintained on file in the Superintendent's office.
2. If no progress has been made towards the stated goals, objectives and target, the EMT determines why, and implements new operating procedures that encourage appropriate personnel at BEST to achieve our stated environmental goals, objectives and targets. A corrective action form is filled out and acted upon to ensure efforts towards achieving a specific goal, objective or target are re-directed. A copy of the corrective action form is included in the appendix to this chapter.
3. The EMT supplements the EPR review by conducting appropriate monitoring and measurement throughout the year. This monitoring and measurement is designed to allow the EMT to gauge how well the park is doing in achieving the goals, objectives and targets, and other EMS requirements. It is designed to allow for "mid-course" EMP corrections to be effected if it is determined that suitable progress towards achieving the goals, objectives, and targets has not been made and their final achievement is unlikely.
4. At six month intervals the EMT reports to the Superintendent on the status of the BEST EMS. The EMT team details the progress made towards achieving the park EMS goals, objectives and targets, and the other requirements the park is obliged to meet under applicable laws, regulations, and policies. Each review is documented and a copy included in the appendix to this chapter.
5. Every three to five months, the park receives a follow-up audit from the region using the NPS Environmental Audit protocol. The EMT coordinates the audit with appropriate regional personnel.

6. As necessary and required by permits or established by an SOP, additional day-to-day or regulatory driven monitoring and measurements are completed and documented by the responsible party. Records are maintained in accordance with established document and record control requirements.

2.0 Responsibilities

The specific responsibilities for monitoring and reporting are dependent on the involvement of individuals in specific goals, objectives and targets. The overall responsibility for ensuring the monitoring and reporting activities described in section 1.0 take place lies with the EMT.

3.0 Appendix

The appendix contains the following:

1. The monitoring and measurement summary matrix (including overall EMS and specific goals, objectives and target responsibilities).
2. A draft corrective action form to be used to correct actions regarding the HM target identified in chapter C.

BEST EMS Doc Control System	Document Name:	BEST Monitor & Measures
	Document Number:	BEST EMS-2003-015-01
	Date of Original Document:	03/03/03
	Date of this Revision:	NA
	Responsible Party:	EMT Leader

Monitoring and Measurement

Review Event	Initiation Date	Responsibility	Results Due	Next Review
Individual environmental program inspections	Various, see SOP master list & schedule	Environmental Coordinator or designated park staff.	Within 5 working days of event unless specified otherwise by regulation.	On-going, See current schedule.
Internal compliance audits	Semi-annually in March and September	Environmental Coordinator selects audit team including team leader	To Environmental Coordinator within 10 working days of completion. Final report to park Superintendent within 15 working days.	March 2003
EMS assessment	Annually in November	EMT	To park Superintendent within 15 working days of completion.	November 2003
Concession evaluation	Annually in November	Concessions Chief/Specialist	To park superintendent within 15 working days of completion.	November 2003
Energy audit	01/02/03	Energy project leader	Completion of walkthrough by 5/03. Summary report by end of 6/03. Completion of staff interviews by end of 7/03. Draft summary report by end 8/03. Recommendations for energy efficiencies and new projects by mid 9/03.	

Review Event	Initiation Date	Responsibility	Results Due	Next Review
HM SOP -development and training	01/02/03	Chief of Maintenance	Draft SOP developed by end of March 03. Training to be completed by end Aug 03.	Inspections to be undertaken of HM storage areas monthly starting September 03

BEST EMS Doc Control System	Document Name:	BEST Corrective Action
	Document Number:	BEST EMS-2003-016-01
	Date of Original Document:	03/03/03
	Date of this Revision:	NA
	Responsible Party:	EMT Leader

HM Storage Corrective Action (CA) Form

CA Requested by:
Date Requested:
Location or Area of Deficiency/Non-conformance (enter HM storage area location):
Source of Finding (incompatible storage, e.g., acids with flammables substances, etc):
Statement of the Issue:
Issue Analysis including Root Cause (lack of labeling, separation of incompatibles, etc.):
Corrective Action Initiated:
Review of CA Effectiveness:
Changes as a Result of CA: Date:

Signed: _____ Title: _____ Date: _____

4.0 Related documentation

NA

5.0 Records

1. EPR summaries will be included in the appendix to this chapter.
2. Any documents developed during monitoring and measurement activities will be included in the appendix to this chapter.
3. Any required corrective action forms will be included in the appendix to this chapter.